REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-35 are pending, of which claims 1, 13, 21-23, 29-31, and 33 have been amended. The amendments to claims 1, 13, 21-23,
5 29-31, and 33 are simply to provide clarification and/or to correct informalities noted by the Applicant, and are not to overcome prior art or any other objections.

35 U.S.C. §103 Claim Rejections

10 **A.** Claims 1-5, 7-12, 17-18, 21-24, and 29-31 are rejected under 35 U.S.C. §103(a) for obviousness over U.S. Patent No. 6,356,941 to Cohen (hereinafter, "Cohen"), in view of U.S. Patent No. 6,314,500 to Rose (hereinafter, "Rose") (*Office Action* p.2). Applicant respectfully traverses the rejection.

15 **B.** Claims 6, 19-20, 25, and 32 are rejected under 35 U.S.C. §103(a) for obviousness over Cohen in view of Rose, and further in view of U.S. Patent No. 6,351,813 to Mooney et al. (hereinafter, "Mooney") (*Office Action* p.9). Applicant respectfully traverses the rejection.

C. Claims 13-14 and 16 are rejected under 35 U.S.C. §103(a) for
20 obviousness over Cohen in view of Rose, and further in view of U.S. Patent No. 6,067,618 to Weber (hereinafter, "Weber") (*Office Action* p.11). Applicant respectfully traverses the rejection.

D. Claim 15 is rejected under 35 U.S.C. §103(a) for obviousness over Cohen in view of Rose and Weber, and further in view of Mooney (*Office*
25 *Action* p.13). Applicant respectfully traverses the rejection.

E. Claims 26-28 and 33-35 are rejected under 35 U.S.C. §103(a) for obviousness over U.S. Patent No. 5,546,557 to Allen et al. (hereinafter,

"Allen"), in view of Rose (*Office Action* p.14). Applicant respectfully traverses the rejection.

Traversal A.   Claims 1-5, 7-12, 17-18, 21-24, and 29-31 rejected

5   over Cohen in view of Rose:

Applicant describes and claims a secure storage unit that is located as a remote unit coupled by a communications network to a client computer. The secure storage unit appears as a local logical storage device to the client computer which can be accessed via standard file access for a peripheral

10   storage device. The client computer and a user of the computer are unaware that the secure storage unit is remote to the client computer (*Specification Summary* pp.3-4).

Cohen describes a method for secure data storage through a protected central storage facility to which access is controlled through a network from a

15   remote location (*Cohen* col.5, lines 40-45). Contrary to the remote storage system described in Cohen, Rose describes a shared memory system within a single computer (*Rose* col.5, lines 10-25). Applicant disagrees with the Cohen-Rose combination because there is no motivation to combine the shared memory system of a single computer in Rose with a computer and remote

20   secure data storage system as described in Cohen. There is no indication whatsoever in Rose of a remote data storage connected via a network to a computer.

Claim 1 recites "initiating a request for accessing a dedicated data

25   storage unit of the remote secure storage facility, the request specifying at least the remote secure storage facility and a user identification code", and

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"identifying the dedicated data storage unit associated with the specified user identification code".

Cohen and/or Rose do not show or disclose a request specifying a remote secure storage facility and a user identification code, or identifying the
5   dedicated data storage unit associated with the specified user identification code, as recited in claim 1. The Office recognizes that Cohen does not teach a data storage unit associated with a user identification code, a request specifying the remote secure storage facility and the user identification code, or identifying the dedicated data storage unit associated with the specified user
10   identification code (*Office Action* p.3).

Thus, the Office cites Rose for teaching a data storage unit associated with a user identification code, and the other features of claim 1 that are not taught by Cohen (*Office Action* p.3). Applicant disagrees that Rose teaches a user identification code as recited within the context of claim 1. As described
15   above, Rose is not analogous to the system of claim 1 that includes a secure storage unit located as a remote unit coupled by a communications network to a client computer. Because Rose describes a memory system within a single computer, there is no need or reason for a user identification code associated with the memory system. The Office cites to source identification information
20   associated with a "requester" in Rose as the user identification code recited in claim 1 (*Office Action* p.3; *Rose* col.5, lines 1-9). However, a requester in Rose is not a user as recited within the context of claim 1. A requester in Rose is simply a processor, processing unit, or logic circuitry within a single computer (*Rose* col.4, lines 36-38).

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Claim 1 also recites "in response to the request, automatically connecting to the remote secure storage facility at the associated address".

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Cohen and/or Rose also do not teach or suggest automatically connecting to the remote secure storage facility in response to a request to access a dedicated data storage unit, as recited in claim 1.

The Office does not cite Rose, but cites Cohen for teaching that a user is

5   provided access to a network vault if permitted to do so (*Office Action* p.3; *Cohen* col.4, lines 23-45). However, there is no indication in Cohen of automatically connecting to a remote secure storage facility in response to a request specifying the remote secure storage facility and a user identification code, as recited in claim 1. As described above, the secure storage unit appears

10   as a local logical storage device to the client computer, and the client computer and a user of the computer are unaware that the secure storage unit is remote to the client computer. Thus, the remote secure storage facility is automatically connected in response to the request, as recited in claim 1.

Accordingly, claim 1 along with dependent claims 2-5 and 7-12 are

15   allowable over the Cohen-Rose combination for at least the reasons described above and Applicant respectfully requests that the §103 rejection be withdrawn.

<u>Claim 17</u> recites a secure storage facility comprising "one or more

20   dedicated data storage units for storing data files in a secure environment, each of the dedicated data storage units identified by at least one user identification code", and means for "receiving an access request from a user on a remotely located client computer" and "identifying a dedicated data storage unit associated with the specified user identification code".

25   Cohen and/or Rose do not teach or suggest a dedicated storage unit identified by a user identification code, or identifying a dedicated data storage unit associated with the specified user identification code, as recited in

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claim 17. As described above in the response to the rejection of claim 1, the Office recognizes that Cohen does not teach the features of claim 17, and there is no indication in Cohen that a dedicated data storage unit is associated with a user identification code. Further, Rose describes a memory system within a

5 single computer system and there is no motivation to combine Rose with Cohen because there is no reason for a user identification code associated with the memory system in Rose.

Accordingly, claim 17 along with dependent claim 18 is allowable over the Cohen-Rose combination and Applicant respectfully requests that the §103

10 rejection be withdrawn.

Claim 21 recites a secure data storage system comprising "a dedicated data storage unit configured to maintain data files generated by the remote computing device, the dedicated data storage unit identified by an identification

15 code corresponding to the remote computing device", and "a processing component configured to receive and process a request to access the dedicated data storage unit, the request specifying the communications network address, the identification code, and a data file maintained with the dedicated data storage unit."

20 Cohen and/or Rose do not teach or suggest a dedicated storage unit identified by an identification code corresponding to a remote computing device, or a request to access the dedicated data storage unit, the request specifying the communications network address, the identification code, and a data file maintained with the dedicated data storage unit, as recited in claim 21.

25 As described above in the response to the rejection of claim 1, the Office recognizes that Cohen does not teach the features of claim 21. Further, Rose describes a memory system within a single computer system and there is no

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motivation to combine Rose with Cohen because there is no reason to identify the memory system in Rose with an identification code corresponding to the computer system that includes the memory system.

5   Accordingly, claim 21 along with dependent claims 22-24 are allowable over the Cohen-Rose combination and Applicant respectfully requests that the §103 rejection be withdrawn.

Claim 29 recites a method comprising "maintaining data files with a dedicated data storage unit that is identified by an identification code 10   corresponding to a remote computing device, the dedicated data storage unit having an associated communications network address" and "receiving a request to access the dedicated data storage unit, the request specifying the communications network address, the identification code, and a data file maintained with the dedicated data storage unit".

15   Cohen and/or Rose do not teach or suggest a dedicated storage unit that is identified by an identification code corresponding to a remote computing device, or a request to access the dedicated data storage unit, the request specifying the communications network address, the identification code, and a data file maintained with the dedicated data storage unit, as recited in claim 29.

20   As described above in the response to the rejection of claim 1, the Office recognizes that Cohen does not teach the features of claim 29. Further, Rose describes a memory system within a single computer system and there is no motivation to combine Rose with Cohen because there is no reason to identify the memory system in Rose with an identification code corresponding to the

25   computer system that includes the memory system.

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Accordingly, claim 29 along with dependent claims 30-31 are allowable over the Cohen-Rose combination and Applicant respectfully requests that the §103 rejection be withdrawn.

5   **Traversal B.**   **Claims 6, 19-20, 25, and 32 rejected over Cohen in view of Rose and Mooney:**

Claim 6 is dependent upon allowable claim 1 which should be allowed over the Cohen-Rose combination as described above in the response to the rejection of claim 1.

10   Claim 19 is dependent upon claim 18 and recites "a data file to be stored in the dedicated data storage unit associated with a user identification code is encrypted in accordance with a user assigned security level." Cohen and/or Rose do not teach or suggest that a data file is encrypted in accordance with a user assigned security level, as recited in claim 19. The Office recognizes that

15   Cohen does not teach an assigned security level and rejects claim 19 along with claim 6 (*Office Action* p.10). However claim 6 does not recite a <u>user</u> assigned security level, as recited in claim 19. The Office does not cite Rose, but cites Mooney for teaching that a data file is encrypted in accordance with an assigned security level (*Office Action* p.10). There is no indication in Mooney,

20   however, that a data file is encrypted in accordance with a <u>user</u> assigned security level.

Accordingly, claim 19 is allowable over the Cohen-Rose-Mooney combination and the §103 rejection should be withdrawn.

Claim 20 is dependent upon allowable claim 17 which should be

25   allowed over the Cohen-Rose combination as described above in the response to the rejection of claim 17.

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Claim 25 is dependent upon allowable claim 21 which should be allowed over the Cohen-Rose combination as described above in the response to the rejection of claim 21.

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Claim 32 is dependent upon allowable claim 29 which should be allowed over the Cohen-Rose combination as described above in the response to the rejection of claim 29.

Traversal C.   **Claims 13-14 and 16 rejected over Cohen in view of Rose and Weber:**

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Claim 13 recites "at least one client computer coupled by a communications network to a secure storage facility located remotely to the client computer", the remote secure storage facility "including at least one dedicated data storage unit for storing data files associated with a user identification code", "receiving a request from a user on the client computer to

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access the logical data storage peripheral, the request specifying at least the logical data storage peripheral and a user identification code", and "automatically connecting to the remote secure storage facility".

Cohen, Rose, and/or Weber do not teach or suggest a secure storage facility located remotely to a client computer and a request specifying at least the

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logical data storage peripheral and a user identification code, as recited in claim 13. Weber is not cited for a "dedicated data storage unit for storing data files associated with a user identification code", and the Office recognizes that Cohen does not teach a user identification code. Further, as described above in the response to the rejection of claim 1, Rose describes a memory system

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within a single computer system and there is no motivation to combine Rose with Cohen because there is no reason to identify the memory system in Rose

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with an identification code corresponding to the computer system that includes the memory system.

Similar to Rose, Weber describes a single computer that includes two or more hard disk drives (*Weber* col.5, lines 14-15). Applicant also disagrees with the Cohen-Weber combination because there is no motivation to combine the memory system of a single computer in Weber with a computer and remote secure data storage system as described in Cohen. There is no indication whatsoever in Weber of a remote data storage connected via a network to a computer. Further, Applicant disagrees that Weber teaches a user identification code as recited within the context of claim 1 because Weber describes a memory system within a single computer, and there is no need or reason for a user identification code associated with the memory system.

Cohen, Rose, and/or Weber do not teach or suggest "automatically connecting to the remote secure storage facility", as recited in claim 13. Neither Rose nor Weber are cited for this feature of claim 13 and, as described above in the response to the rejection of claim 1, there is no indication in Cohen of automatically connecting to a remote secure storage facility, as recited in claim 13.

Accordingly, claim 13 along with dependent claims 14 and 16 are allowable over the Cohen-Rose-Weber combination for at least the reasons described above and Applicant respectfully requests that the §103 rejection be withdrawn.

Traversal D. **Claim 15 rejected over Cohen in view of Rose, Weber, and Mooney:**

Claim 15 is dependent upon claim 13 (via claim 14) and recites that a data file "is encrypted in accordance with a user assigned security level." The

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Office does not cite Rose or Weber to reject claim 15, and the Office recognizes that Cohen does not teach encrypting a data file in accordance with a user assigned security level (*Office Action* p.14). As described above in the response to the rejection of claim 19, there is no indication in Mooney that a

5   data file is encrypted in accordance with a <u>user</u> assigned security level.

Accordingly, claim 15 is allowable over the Cohen-Rose-Weber-Mooney combination and Applicant respectfully requests that the §103 rejection be withdrawn.

10   <u>Traversal E.</u>   <u>Claims 26-28 and 33-35 rejected over Allen in view</u> <u>of Rose</u>:

<u>Claim 26</u> recites a computing device comprising "a logical data storage peripheral corresponding to a remote secure data storage system that includes a dedicated data storage unit configured to maintain data files generated by the

15   computing device, the dedicated data storage unit identified by an identification code corresponding to the computing device", "a controller configured to receive a request to access the logical data storage peripheral, the request specifying the logical data storage peripheral, the identification code, and a data file maintained with the dedicated data storage unit", and "the controller

20   further configured to communicatively couple the computing device to the remote secure data storage system and communicate the request to access the logical data storage peripheral to the remote secure data storage system."

Allen and/or Rose do not teach or suggest a computing device and a remote secure data storage system, or the combination of features recited in

25   claim 26. For example, the Office recognizes that Allen does not teach a dedicated data storage unit identified by an identification code corresponding to a computing device, as recited in claim 26 (*Office Action* p.15). As described

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above in the response to the rejection of claim 1, Rose also does not teach a remote dedicated storage unit identified by an identification code corresponding to a computing device because Rose describes a memory system within a single computer system and there is no reason to identify the memory

5   system with an identification code corresponding to the computer system that already includes the memory system.

Accordingly, claim 26 along with dependent claims 27-28 are allowable over the Allen-Rose combination for at least the reasons described above and Applicant respectfully requests that the §103 rejection be withdrawn.

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Claim 33 recites "generating a request to access a logical data storage peripheral that corresponds to a remote secure data storage system which includes a dedicated data storage unit to maintain data files generated by a computing device, the dedicated data storage unit identifiable by an

15   identification code that corresponds to the computing device", "receiving the request to access the logical data storage peripheral, the request specifying the logical data storage peripheral, the identification code, and a data file maintained with the dedicated data storage unit", "communicatively coupling the computing device to the remote secure data storage system", and

20   "communicating the request to access the logical data storage peripheral to the remote secure data storage system."

Allen and/or Rose do not teach or suggest a computing device and a remote secure data storage system, or the combination of features recited in claim 33. For example, the Office recognizes that Allen does not teach a

25   dedicated data storage unit identifiable by an identification code that corresponds to a computing device, as recited in claim 33 (*Office Action* p.15). As described above in the response to the rejection of claim 1, Rose also does

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not teach a remote dedicated storage unit identified by an identification code corresponding to a computing device because Rose describes a memory system within a single computer system and there is no reason to identify the memory system with an identification code corresponding to the computer system that

5   already includes the memory system.

Accordingly, claim 33 along with dependent claims 34-35 are allowable over the Allen-Rose combination and Applicant respectfully requests that the §103 rejection be withdrawn.

10   **Conclusion**

Pending claims 1-35 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. If any issues remain that preclude issuance of this application, the Examiner is urged to contact the undersigned attorney before issuing a subsequent Action.

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Respectfully Submitted,

Dated: _Jun 22, 2004_   By: _____

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